PART 70 OPERATING PERMIT FACT SHEET W. L. GORE & ASSOCIATES, INC.

CHERRY HILL 2401 SINGERLY ROAD ELKTON, MD 21921

PART 70 OPERATING PERMIT NO. 24-015-00079 Draft 2008

BACKGROUND

W. L. Gore & Associates, Inc. – Cherry Hill facility is located at 2401 Singerly Road in Cecil County, Maryland. W. L. Gore & Associates, Inc. is a worldwide manufacturing corporation with headquarters in Newark, Delaware. The Cherry Hill plant operations utilize Fluoropolymer material (FPM) forming and stretching equipment. The primary SIC for this facility is 3087.

The following table summarizes the actual emissions from W.L. Gore – Cherry Hill Plant based on its Emission Certification Report.

Table 1: Actual Emissions

Year	NOx (TPY)	SOx (TPY)	PM ₁₀ (TPY)	CO (TPY)	VOC (TPY)	HAPs
2006	8	4	0.5	1.3	12	0
2005	8	4	0	1	14	0
2004	7	3	0	1	16	0
2003	7	3	0	1	13	0

The major source threshold for triggering Title V permitting requirements in Cecil County is 25 tons per year for NOx, 25 tons per year for VOCs, and 100 tons per year for any other criteria pollutants. The facility's potential to emit VOC emissions are greater than the major source threshold, therefore, W. L. Gore & Associates, Inc. – Cherry Hill Plant is required to obtain a Title V-Part 70 Operating Permit under COMAR 26.11.03.01.

The Department on May 31, 2002 received the Part 71 permit application for W. L. Gore & Associates, Inc. – Cherry Hill Plant. An administrative completeness review was conducted and the application was deemed to be administratively complete. A letter was sent to W.L. Gore – Cherry Hill Plant on July 16, 2002, granting an application shield. The Part 71 permit application will serve as a revised Part 70 permit application for the issuance of this Part 70 permit.

CAM Applicability

W.L. Gore & Associates, Inc.-Cherry Hill conducted a Compliance Assurance Monitoring (CAM) analysis for the facility and determined that certain Emission Units: <u>EU3-1</u>, <u>EU3-2</u>, <u>EU3-3</u>, <u>EU3-4</u> is subject to the (CAM) Rule 40 CFR Subpart 64.

EMISSION UNIT IDENTIFICATION

The Cherry Hill Plant has identified the following emission units as being subject to the Title V permitting requirements and having applicable requirements.

Table 2: Emission Unit Identification

Emissions Unit Number	MDE Registration Number	CH Number	Emissions Unit Description	Date of Installation
EU 1-1 Particulate Matter	6-0104	63203	Mixing and Compounding Area (Filled Products front end controlled by baghouse	05/2001 & 07/2002
Emitting Units		1931985	Mixing and Compounding Area – fugitive emissions.	08/2002
EU 2-1 Boilers	4-0223 & 4-0224		Two (2) Burnham No.2 fuel oil/propane fired boilers each rated at 9.45 million Btu per hour heat input and equipped with low NO _x burners. Boilers modified on February 8, 2008 to burn used oil and waste combustible fuels.	12/2006 Modified 2/8/08
	4-0156	5456	One Weil McLain No. 2 fuel oil boiler rated at 4.9 million Btu per hour heat input. (Boiler #1). Boiler modified on February 8, 2008 to burn used oil and waste combustible fuels	03/1985
	4-0200	2594	One Weil McLain No. 2 fuel oil boiler rated at 8.6 million Btu per hour heat input. (Boiler #3). Boiler modified on February 8, 2008 to burn used oil and waste combustible fuels	11/1997
EU2-2 Emergency Generator	9-0169		One (1) Onan 1200 bhp (800 kW) diesel emergency generator	12/2006
EU 3-1 Natural FPM Product Area	6-0102	2203	R&D Wing (TD1) vented to the oxidizer control system and atmosphere.	01//1995
vented through the oxidizer	6-0100	2208	Truck drying oven located in the FPM Area vented to an oxidizer control system and to the atmosphere.	09/1994
control system	7-0045	1045, 1314, 1632,* 2056, 1381	Five (5) Drum dryers located in the FPM Area vented to the oxidizer control system and to the atmosphere.	Pre 1990
	6-0275	1899969	Dryer-Med tenter.	08/2007
	6-0260	1316	One dryer vented to an oxidizer control system.	Pre-1990
EU 3-2 Filled FPM Products Area	6-0126	2383	Oven (TD2) located in the filled area vented to the oxidizer control system and to the atmosphere.	06/1996
vented through the oxidizer	6-0276	2404	Oven (TD3) located in the FPM area vented to the oxidizer control system and to the atmosphere.	07/1997

Emissions Unit Number	MDE Registration Number	CH Number	Emissions Unit Description	Date of Installation
control system	6-0131	2204	Oven (GT7) located in the R&D area vented to the oxidizer control system and to the atmosphere.	09/1996
	6-0279	2615	R&D oven vented to an oxidizer control system.	05/1999
EU 3-3 FPM	6-0073	2573	One (1) drying oven in FP and vented to the atmosphere.	01/1999
Processing Area vented to atmosphere	6-0130	0685, 2281, 2260, 2505	Four (4) electric ovens: Three (3) located in the Resin area Lab; and one in the Gen Lab, all vented to the atmosphere.	08/1982, 07/1996 & 09/1999
	6-0041	2365 & 2366	Two (2) R&D ovens located in the Filled Product area vented to the atmosphere.	07/1992 & 10/2003
EU 3-4 Ovens vented to Oxidizer control system	6-0173 M	60564	One (1) batch-drying oven vented to the oxidizer control system to control VOC emissions and vented to the atmosphere.	12/1999
		2439 & 2440	Two (2) batch-drying ovens vented to the oxidizer control system to control VOC emissions and vented to the atmosphere.	03/1999
		2597 & 2598	Two (2) batch-drying ovens vented to the oxidizer control system to control VOC emissions and vented to the atmosphere.	02/2000
		2369, 60535, 62581	Oxidizer Control System consisting of Willie, Sara & Tec.	06/1996;03/ 1999; 01/2002
	6-0278	60648	One Rover dryer vented to the oxidizer control system and vented to the atmosphere.	01/1999
	6-0192	62177	One (1) batch-drying oven vented to the oxidizer control system to control VOC emissions and vented to the atmosphere.	04/2002
EU 3-5		PM5084	Cold Maintenance Degreaser (30.5 gallon capacity). See Insignificant Activity List	

AN OVERVIEW OF THE PART 70 PERMIT

Section I of the Part 70 Permit contains a brief description of the facility and an inventory list of the emissions units for which applicable requirements are identified in Section IV of the permit.

Section II of the Part 70 Permit contains the general requirements that relate to administrative permit actions. This section includes the procedures for renewing, amending, reopening, and transferring permits, the relationship to permits to construct and approvals, and the general duty to provide information and to comply with all applicable requirements.

Section III of the Part 70 Permit contains the general requirements for testing, record keeping and reporting; and requirements that affect the facility as a whole, such as open burning, air pollution episodes, particulate matter from construction and demolition activities, asbestos provisions, ozone depleting substance provisions, general conformity, and acid rain permit. This section includes the requirement to report excess emissions and deviations, to submit an annual emissions certification report and an annual compliance certification report, and results of sampling and testing.

Section IV of the Part 70 Permit identifies the emissions standards, emissions limitations, operational limitations, and work practices applicable to each emissions unit located at the facility. For each standard, limitation, and work practice, the permit identifies the basis upon which the Permittee will demonstrate compliance. The basis will include testing, monitoring, record keeping, and reporting requirements. The demonstration may include one or more of these methods.

Section V of the Part 70 Permit contains a list of insignificant activities. These activities emit very small quantities of regulated air pollutants and do not require a permit to construct or registration with the Department. For insignificant activities that are subject to a requirement under the Clean Air Act, the requirement is listed under the activity.

Section VI of the Part 70 Permit contains State-only enforceable requirements. Upon issuance of the Part 70 Permit, the Part 70 Permit supercedes the facility's current State Permit to Operate. Section VI identifies requirements that are not based on the Clean Air Act, but solely on Maryland air pollution regulations. These requirements generally relate to the prevention of nuisances and implementation of Maryland's Air Toxics Program.

REGULATORY REVIEW/TECHNICAL REVIEW/COMPLIANCE METHODOLOGY

Emission Units: EU 1-1

Particulate Matter Emitting Units (6-0104 M)

Mixing and Compounding Area - Filled Products front end controlled by baghouse. Mixing and Compounding Area - Fugitive emissions

<u>Note</u>: These installations are minor sources of particulate matter. The emission certification for 2006 reported 0.136tons of PM.

Applicable Standards and limits:

A. Control of Visible Emissions

COMAR 26.11.06.02C(1) - <u>Visible Emission Standards</u>. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity."

COMAR 26.11.06.02A(2) – <u>General Exception</u>. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance demonstration:

The Permittee shall conduct a monthly 6-minute visual observation of the baghouse exhaust. The visual observation must be conducted while the baghouse is in operation. If no visible emissions are observed in six consecutive monthly observations from the baghouse exhaust, the Permittee may decrease the frequency of visual observations from monthly to quarterly for the baghouse exhaust. If visible emissions are observed during any quarter visual observation, the Permittee must resume the observation of the baghouse exhaust on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly visual observations. If visible emissions are observed during any observation, the Permittee must conduct an 18-minute test of opacity in accordance with Method 9. The Method 9 test must begin within 24-hours of any observation of visible emissions. The Permittee shall maintain on site a log of the dates and results of visible emissions observations for a period of at least 5 years. The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". [Reference: COMAR 26.11.03.06C]

B. Control of Particulate Matter Emissions

COMAR 26.11.06.03B(1) – <u>Particulate Matter from Confined Sources</u>. "A person may not cause or permit particulate matter to be discharged from any installation constructed on or after January 17, 1972 in excess of 0.05 gr/scfd (115 kg/dscm)."

Compliance demonstration:

The Permittee shall develop and maintain a preventive maintenance plan for the baghouse that describes the maintenance activity and time schedule for completing each activity. The Permittee shall perform maintenance activities within the time frames established in the plan and shall maintain a log with records of the dates and description of the maintenance that was performed. The Permittee shall maintain a copy of the preventive maintenance plan and a record of the dates of and description of maintenance activity performed. The Permittee shall maintain records of the baghouse malfunctions and the corrective actions taken to bring into proper operation. The Permittee shall submit a copy of the preventive maintenance plan,

records of maintenance activities and corrective actions taken upon request. [Reference: COMAR 26.11.03.06C].

Emission Units: EU 2-1

Boilers

Two (2) Burnham No.2 fuel oil/propane fired boilers each rated at 9.45 million Btu per hour heat input and equipped with low NO_x burners. (Boilers #4 & #5) [4-0223 & 4-0224]

One (1) Weil McLain No. 2 fuel oil boiler rated at 4.9 million Btu per hour heat input. (Boiler #1) [4-0156]

One (1) Weil McLain No. 2 fuel oil boiler rated at 8.6 million Btu per hour heat input. (Boiler #3) [4-0200]

The Permittee applied and was issued a modification to the boilers on February 8, 2008 to burn used oil and waste combustible fuels.

The following boilers were removed since the issuance of the initial part 70 operating permit: Two (2) boilers: one (1) 2.9 million Btu per hour heat input (CH5457, PTC#4-0178) removed in 2007 and one (1) 1.2 million Btu per hour heat input (CH5455, PTC#4-0152) removed in 2005.

Note: For Control of Particulate Matter: "The requirements in Figure 1 and 2 of this chapter do not apply to fuel burning equipment burning gas or distillate oil." [Reference: COMAR 26.11.09.06A(3)(c)]

Applicable Standards and limits:

A. Control of Visible Emissions

COMAR 26.11.09.05A(1) - <u>Fuel Burning Equipment</u>. "A person may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is greater than 20 percent opacity."

COMAR 26.11.09.05A(3) - <u>Exceptions</u>. "Section A(1) and (2) of this regulation do not apply to emissions during load changing, soot blowing, startup, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty minute period."

<u>Compliance demonstration</u>: - The Permittee shall properly operate and maintain the boilers in a manner to prevent visible emissions. The Permittee shall maintain an operations manual and preventive maintenance plan, and a log of maintenance performed that relates to combustion performance. The Permittee shall report incidents of visible emissions in accordance with permit condition 4 of Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations". The basis for these monitoring, record keeping, and reporting requirements is the Department's authority to create periodic monitoring requirements. [Reference: COMAR 26.11.03.06C].

<u>Rationale for Periodic Monitoring</u> - Boilers that burn No.2 fuel oil with a rated heat input capacity of less than 10 MM Btu/hr typically never have visible emissions if properly operated and maintained. Boilers in this size range are set up to operate in an automatic mode without oversight of an operator. The completion of annual preventative maintenance as recommended by the boiler manufacturer, focusing on combustion performance, is sufficient to maintain compliance with the no visible emissions requirement. Even though there is not a specific schedule to perform observations of the stack emissions, the Permittee is required

under the general reporting requirement for excess emissions and deviations to report incidents when visible emissions exceed 20 percent opacity.

B. Control of Sulfur oxides Emissions.

COMAR 26.11.09.07A(1)(c). <u>Sulfur Content Limitations for Fuel</u>. "A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: Distillate fuel oils, 0.3 percent."

<u>Compliance demonstration</u>: The Permittee shall obtain a certification from the fuel supplier with each shipment indicating that the oil complies with the limitation on the sulfur content of fuel oil. The Permittee shall retain fuel supplier certifications of sulfur content in fuel. The Permittee shall report fuel supplier certifications of sulfur content in fuel to the Department upon request. The basis for these monitoring, records keeping, and reporting requirements is the Department's authority to create periodic monitoring requirements. [Reference COMAR 26.11.03.06C].

<u>Rationale</u>: The strategy for the compliance demonstration is based on the compliance demonstration for NSPS Subpart Dc boilers that burn fuel oil.

C. Operational Limits:

The boilers shall burn No. 2 fuel oil, used oil or waste combustible fluids only. [Reference: MDE Permit to Construct Nos. 015-0079-4-0223 & 4-0224, 4-0156, & 4-0200 Part C(2) issued February 8, 2008]

<u>Compliance Demonstration:</u> The Permittee is required to maintain records of the types and quantity of fuel burned to support the annual emissions certification report (permit condition 8 of Section III, Plant Wide Conditions "Emissions Certification Report). The annual certification report must contain the type, quantities, and analyses of all fuels burned. No additional requirements are needed to show compliance with this operational limitation.

Emission Units: <u>EU2-2</u> <u>Emergency Generator</u>

One (1) Onan 1200 bhp (800 kW) diesel emergency generator. [9-0169]

Applicable Standards and limits:

A. Control of Visible Emissions

COMAR 26.11.09.05B - <u>Stationary Internal Combustion Engine Powered Equipment</u> "(2) Emissions During Idle Mode. A person may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.

- (3) Emissions During Operating Mode. A person may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (4) Exceptions.
- (a) Section B(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
- (b) Section B(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
- (i) Engines that are idled continuously when not in service: 30 minutes;
- (ii) All other engines: 15 minutes.
- (c) Section B(2) and (3) does not apply while maintenance, repair, or testing is being performed by qualified mechanics."

Compliance Demonstration:

The Permittee shall properly operate and maintain the emergency generator in a manner to prevent visible emissions. The Permittee shall maintain an operations manual and preventive maintenance plan. The Permittee shall maintain a log of maintenance performed that relates to combustion performance. [Reference: COMAR 26.11.03.06C] The Permittee shall report incidents of visible emissions in accordance with permit condition 4, Section III, Plant Wide Conditions, "Report of Excess Emissions and Deviations"

B. Control of Sulfur Oxides Emissions

COMAR 26.11.09.07A(1)(c). <u>Sulfur Content Limitations for Fuel</u>. "A person may not burn, sell, or make available for sale any fuel with a sulfur content by weight in excess of or which otherwise exceeds the following limitations: Distillate fuel oils, 0.3 percent."

Compliance Demonstration:

The Permittee shall obtain a certification from the fuel supplier with every shipment indicating that the oil complies with the limitation on the sulfur content of fuel oil. [Reference: COMAR 26.11.03.06C]. The Permittee shall retain fuel supplier certifications stating that the fuel oil is in compliance with this regulation. The Permittee shall report fuel supplier certifications to the Department upon request. [Reference: COMAR 26.11.09.07C].

Operational Limit

The emergency diesel generator shall be used for emergency use only and shall not operate more than 500 hours a year, unless the Permittee obtains prior written approval from the Department. [Reference; Permit to construct 9-0169, Part D(2

Compliance Demonstration:

The Permittee shall maintain a log for the emergency generator indicating the amounts of fuel oil combusted, the hours of operation, and reason for generator operation (i.e. maintenance or operational testing, power outage, etc.) [Reference: Permit to construct 9-0169, Part E(1)]. The Permittee shall maintain logs on site for at least five (5) years and make available to the Department upon request. [Reference; Permit to construct 9-0169, Part E(2)] The Permittee shall submit a record of the logs with the annual emissions certification report. See permit condition 8 of Section III.

Emission Units: EU 3-1, EU 3-2, EU 3-3 & EU 3-4

EU 3-1 - Natural FPM Product Area vented through the oxidizer control system

EU3-2 - Filled FPM Products Area vented through the oxidizer control system.

EU3-3 - FPM Processing Area vented to atmosphere.

EU3-4 - Ovens vented to Oxidizer control system.

<u>Please Note</u>: The oxidizer control system (OCS) includes the following oxidizers: SARA (oxidizer #1), T-Ox (oxidizer #2) and WILLIE (oxidizer #3).

The facility-conducted performance testing on the oxidizers as follow:

T-Ox (installed 6/1996) - July 1998 which resulted in 99.10 percent VOC destruction and removal efficiency;

WILLIE (installed 3/1999) – February 2002 which resulted in a VOC destruction and removal efficiency of 98 percent. Again in March 2007 which resulted in a VOC destruction and removal efficiency of 99.2 percent.

SARA (installed 1/2002) – August 12 & 13, 2002 which resulted in a VOC destruction efficiency of 99.19 percent.

The OCS operates in a lead-lag fashion. Willie acts as the lead oxidizer and handles most of the load, most of the time, with SARA in standby mode and Tec standby/shutdown mode (off-line and cool). As Willie approaches maximum capacity, SARA begins to ramp up to the set point combustion temperature. Tec is used during emergency situations, and as backup when maintenance is required on Willie or SARA, and for additional control as needed.

The following permits to construct were updated/modified to reflect that the Oxidizer Control System (OCS) controls the emissions from the process unit not one specific thermal oxidizer or re-registered to reflects the addition of the OCS for emission control since the issuance of the Title V permit: CJS-Truck dryer (CH#2208, PTC #6-0100); Dryer TD1 (CH#2203, PTC #6-0102); TD2 (CH#2383, PTC #6-0126); the Dryer-GT7 (CH#2204, PTC #6-0131); Five FP dryers (CH#2439, CH#2440, CH#2597, CH#2598, CH#60564, PTC #6-0173); FP Rapid Proto R&D oven (CH#62177, PTC #6-0192); Five Drum dryers (CH#1045, CH#1314, CH#1381, CH#1632, CH#2056, PTC #7-0045); TD3 dryer (CH#2404, PTC #6-0276); Rover (CH#60648, PTC #6-0278); Dryer (CH#1316, PTC#6-0260); R&D Oven (CH#2615, PTC#6-0279).

The following processes were removed: Tape treatment and drying oven CH#2642 – removed 2002; Three powder-drying ovens in the solvent tape drying area CH#61253, CH#61274, CH#61275 – removed in 2003; Three IHEI powder-drying ovens CH#61744, CH#61745, CH#61746 – removed in 2005.

Applicable Standards and limits:

A. Control of Visible Emissions.

COMAR 26.11.06.02C(1) - <u>Visible Emission Standards</u>. "A person may not cause or permit the discharge of emissions from any installation or building, other than water in an uncombined form, which is greater than 20 percent opacity."

COMAR 26.11.06.02A(2) – <u>General Exception</u>. "The visible emissions standards in §C of this regulation do not apply to emissions during start-up and process modifications or adjustments, or occasional cleaning of control equipment, if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any 60 minute period."

Compliance Demonstration:

The Permittee shall visually inspect the exhaust of the oxidizer control system at least monthly for a 6-minute period when the process lines are in operation and shall record the results of each observation. If no visible emissions are observed in six consecutive monthly observations, the frequency of visual observation may decrease from monthly to quarterly If emissions are visible greater than 20 percent opacity from oxidizers, the Permittee shall perform the following unless it can be shown, through a Method 9 test, that the visible emissions are zero percent opacity:

- (a) inspect all process and/or control equipment related to emission point;
- (b) perform all necessary repairs and/or adjustments to the oxidizers, within 48 hours, so that visible emissions in the exhaust gases are less than 20 percent opacity; and
- (c) document, in writing, the results of the inspections and the repairs and/or adjustments made to the oxidizers.

If visible emissions greater than 20 percent opacity have not been eliminated within 48 hours, the Permittee shall perform a Method 9 observation once daily when the process lines are in

operation until the visible emissions have been reduced to less than 20 percent opacity. The Permittee shall keep records of the results of visual emission observations and document any incidence of visible emissions and corrective action taken by the Permittee. The Permittee shall report incidents of visible emissions in accordance with Permit Condition 4, Section III, "Reports of Excess Emissions and Deviations" [Reference: COMAR 26.11.03.06C]

B. Control of VOC Emissions

COMAR 26.11.19.30E - General Requirements for FPM Process Installations.

- "(1) A person who owns or operates an FPM process installation that has actual uncontrolled VOC emissions of 50 pounds or more per day shall vent the emissions into a thermal oxidizer system or other control method approved by the Department to destroy or reduce VOC emissions by 85 percent or more, overall.
- (2) If a thermal oxidizer is installed, the oxidizer combustion chamber shall be:
- (a) Operated at a minimum combustion chamber temperature of 1400°F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation;
- (b) Equipped with a continuous temperature monitor to record the oxidizer temperature; and
- (c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and
- (d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating.
- (3) If a source uses an alternative control method approved by the Department, the alternative control method shall be monitored as required by the Department.
- (4) Equipment that is installed for the purpose of treating emissions or monitoring shall be operated, maintained, and as applicable, calibrated in accordance with the equipment vendor's specifications.
- (5) A person who owns or operates an FPM compounding and tape or shape-forming installation shall minimize fugitive emissions of VOC by:
- (a) Immediately enclosing all wet FPM during storage; and
- (b) Covering dipping troughs when not in operation.
- (6) A person who owns or operates an FPM coating installation that has actual uncontrolled VOC emissions of 20 pounds or more per day may not use a coating that has a VOC content exceeding 2.9 pounds per gallon unless the installation is equipped with a control device that meets the requirements in §E(2), (3), and (4) of this regulation."

Compliance Demonstration:

COMAR 26.11.19.30 F - <u>Demonstration of Compliance:</u> Compliance with this regulation shall be demonstrated using the applicable VOC test methods specified in COMAR 26.11.01.04C or other test method approved by the Department.

The Permittee shall conduct performance testing of the primary oxidizer in the control system once during the 5-year term of the permit. The Permittee shall submit a test protocol to the Department for approval at least 30 days prior to proposed date of the test. The Permittee shall report results of the performance testing to the Department within 45 days after completion of the test. . [Reference: COMAR 26.11.03.06C].

The Permittee shall perform checks semi-annually on the thermocouples that monitor the temperatures to the oxidizer control system for accuracy. The Permittee shall keep records of the semi-annual checks of the thermocouples. The Permittee shall make the records of the thermo couple checks made available to the Department upon request [Reference: COMAR 26.11.03.06C].

For the oxidizer control system, the combustion chamber shall be:

- (a) Operated at a minimum combustion chamber temperature of 1400 °F or other temperature approved by the Department that is demonstrated to achieve compliance with this regulation;
- (b) Equipped with a continuous temperature monitor to record the oxidizer temperature; and
- (c) Equipped with an alarm system that alerts the operator when the oxidizer combustion chamber temperature is less than the approved temperature; and
- (d) Equipped with an interlock system that prevents operation of the FPM installation unless the approved control system is operating." [Reference: COMAR 26.11.19.30E(2)].

The Permittee shall demonstrate compliance with the interlock alarm system by continuously recording the damper position and the corresponding chamber temperature of the oxidizer control system.

The following records shall be kept on site for a period of at least five (5) years except for the design data, which shall be retained permanently. The records shall be made available to the Department on request:

- (1) Permanent records for the life of the equipment of pertinent design data for the control device including manufacturer specifications and/or vendor guarantees for the control device and catalyst, catalyst requirements, design space velocity, operating limits, volume and configuration of catalyst required;
- (2) Maintenance records of types and dates of work performed on the oxidizer control system;
- (3) Records of the combustion chamber temperature, which shall be greater than 1400 °F any time a controlled process line is in operation; and
- (4) Records of the results of destruction efficiency tests. [Reference: COMAR 26.11.19.30E(2)].

See CAM Plan (40 CFR Part 64) – Compliance Assurance Monitoring) for additional monitoring requirements.

Emission Units: Facility-Wide

Applicable Standards and limits:

Control of VOC Emissions

- A. COMAR 26.11.19.02I <u>Good Operating Practices, Equipment Cleanup and VOC Storage</u> "(1) <u>Applicability.</u> The requirements in this section apply to a person who owns or operates an installation that is subject to any requirement in this chapter.
 - (2) Good Operating Practices.
 - (a) A person who is subject to this section shall implement good operating practices to minimize VOC emissions into the atmosphere.
 - (b) Good operating practices shall, at a minimum, include the following:
 - (i) Provisions for training of operators on practices, procedures, and maintenance requirements that are consistent with the equipment manufacturers' recommendations and the source's experience in operating the equipment, with the training to include proper procedures for maintenance of air pollution control equipment:
 - (ii) Maintenance of covers on containers and other vessels that contain VOC and VOC-containing materials when not in use;
 - (iii) As practical, scheduling of operations to minimize color or material changes when applying VOC coatings or other materials by spray gun;
 - (iv) For spray gun applications of coatings, use of high volume low pressure (HVLP) or other high efficiency application methods where practical; and
 - (v) As practical, mixing or blending materials containing VOC in closed containers and taking preventive measures to minimize emissions for products that contain VOC.
 - (c) A person subject to this regulation shall:
 - (i) Establish good operating practices in writing;

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- (ii) Make the written operating practices available to the Department upon request; and (iii) Display the good operating practices so that they are clearly visible to the operator or include them in operator training.
- (3) Equipment Cleanup.
- (a) A person subject to this section shall take all reasonable precautions to prevent or minimize the discharge of VOC into the atmosphere when cleaning process and coating application equipment, including containers, vessels, tanks, lines, and pumps.
- (b) Reasonable precautions for equipment cleanup shall, at a minimum, include the following:
- (i) Storing all wastes and waste materials, including cloth and paper that are contaminated with VOC. in closed containers:
- (ii) Preparing written standard operating procedures for frequently cleaned equipment, including when practical, provisions for the use of low-VOC or non-VOC materials and procedures to minimize the quantity of VOC materials used:
- (iii) Using enclosed spray gun cleaning, VOC-recycling systems and other spray gun cleaning methods where practical that reduce or eliminate VOC emissions; and
- (iv) Using, when practical, detergents, high-pressure water, or other non-VOC cleaning options to clean coating lines, containers, and process equipment.
- (4) VOC Storage and Transfer.
- (a) A person subject to this section who stores VOCs shall, at a minimum, install conservation vents or other vapor control measures on storage tanks with a capacity of 2,000 gallons or more, to minimize VOC emissions.
- (b) A person subject to this section shall, at a minimum, utilize vapor balance, vapor control lines, or other vapor control measures when VOCs are transferred from a tank truck into a stationary storage tank with a capacity greater than 10,000 gallons and less than 40,000 gallons that store VOCs or materials containing VOCs, other than gasoline, that have a vapor pressure greater than 1.5 psia."

Compliance Demonstration

The Permittee shall conduct facility-wide inspections at least once per calendar month to determine the compliance status of facility operations with regard to implementation of "good operating practices" designed to minimize emissions of VOC. [Reference: COMAR **26.11.03.06C**]. The Permittee shall maintain:

- Written descriptions of all "good operating practices" designed to minimize emissions of VOC from facility-wide operations. [Reference: COMAR 26.11.19.021]
- 2) Records of all inspections conducted to determine the facility's compliance status with regard to implementation of "good operating practices" designed to minimize emissions of VOC from facility-wide operations. The records shall include for each inspection the name of the inspector, the date and time of the inspection, and an account of the findings. [Reference: COMAR 26.11.03.06C].

Good operating practices information as required by COMAR 26.11.19.02I shall be made available to the Department upon request

B. COMAR 26.11.19.16C - Control of VOC Leaks

General Requirements. "A person subject to this regulation shall comply with all of the following requirements:

- (1) Visually inspect all components on the premises for leaks at least once each calendar
- (2) Tag any leak immediately so that the tag is clearly visible. The tag shall be made of a material that will withstand any weather or corrosive conditions to which it may be normally exposed. The tag shall bear an identification number, the date the leak was discovered, and the name of the person who discovered the leak. The tag shall remain in place until the leak has been repaired.

- (3) Take immediate action to repair all observed VOC leaks that can be repaired within 48 hours.
- (4) Repair all other leaking components not later than 15 days after the leak is discovered. If a replacement part is needed, the part shall be ordered within 3 days after discovery of the leak, and the leak shall be repaired within 48 hours after receiving the part.
- (5) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced, such as seals, gaskets, packing, and pipefittings.
- (6) Maintain a log that includes the name of the person conducting the inspection and the date on which leak inspections are made, the findings of the inspection, and a list of leaks by tag identification number. The log shall be made available to the Department upon request. Leak records shall be maintained for a period of not less than 2 years from the date of their occurrence."

COMAR 26.11.19.16D. <u>Exceptions</u>. "Components that cannot be repaired as required in this regulation because they are inaccessible, or that cannot be repaired during operation of the source, shall be identified in the log and included within the source's maintenance schedule for repair during the next source shutdown."

Compliance Demonstration

The Permittee shall:

- (1) Visually inspect all components (process equipment, storage tanks, pumps, compressors, valves, flanges, pipeline fittings, pressure relief valves) at the facility for leaks at least once each calendar month;
- (2) Tag any leak immediately with I.D. Number, the date VOC leak was discovered, and the name of the person who discovered the leak. The tag is to remain in place until the VOC leak is repaired;
- (3) Take immediate action to repair/control all observed VOC leaks that can be repaired within 48 hours;
- (4) Repair all other leaking components not later than 15 days after the VOC leak is discovered in accordance with COMAR 26.11.19.16C(4);
- (5) If a replacement part is needed, it shall be ordered within 3 days after discovery of the leak and the VOC leak shall be repaired within 48 hours after receiving the part;
- (6) Maintain a supply of components or component parts that are recognized by the source to wear or corrode, or that otherwise need to be routinely replaced; and
- (7) Identify in a log components that cannot be repaired as required by this regulation because they are inaccessible, or that cannot be repaired during operation of the source, and include them within the source's maintenance schedule for repair during the next source shutdown.

[Reference: COMAR 26.11.19.16C and D]

The Permittee shall:

- (1) Maintain a log that includes the name of the person conducting the inspection, the date on which VOC leak inspection was made, the findings of the inspection, a list of VOC leaks by tag identification number, the date the part was ordered, and the date the VOC leak was repaired; and
- (2) Make the log available to the Department upon request and shall be maintained for a period of not less than two years from the date of the leaks' occurrence.

[Reference: COMAR 26.11.19.16C(6)]

VOC Leak inspection logs as required by COMAR 26.11.19.16 shall be made available to the Department upon request.

Compliance Assurance Monitoring (CAM) Requirements [40 CFR Part 64] – Table 6 in Section IV of the Part 70 Permit.

CAM is intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act for large emission units that rely on air pollution control (APC) equipment to achieve compliance. The CAM approach established monitoring for the purpose of:

- (1) Documenting continued operation of the control measures within ranges of specified indicators of performances (such as emissions, control device parameters, and process parameters) that are designed to provide a reasonable assurance of compliance with applicable requirements:
- (2) Indicating any excursions from these ranges; and
- (3) Responding to the data so that the causes of or caused excursions are corrected.

In order for a unit to be subject to CAM, the unit must be located at a major source, be subject to an emission limitation or standard; use a control device to achieve compliance; have pre-control emissions of at least 100 percent of the major source amount; and must not otherwise be exempt from CAM. Applicability determinations are made on a pollutant-by-pollutant basis for each emission unit.

The Pollutant specific emission units (PSEU) consist of dryers and ovens that support the FPM shaping and forming processes. The dryers and ovens are controlled by the Oxidizer Control System (OCS), which consist of three regenerative thermal oxidizers (RTO).

The dryers and ovens are used to drive off liquid VOC and/or water from the FPM materials or add certain properties to the product. The dryers and ovens are ducted to the OCS and operate, as a batch process and an as needed basis depending on production demands. All the dryers and ovens are interlocked with the OCS so that they can only operate when the OCS is at temperatures greater than 1400 °F. If temperatures approach 1400 °F, the alarm system will alert operators of low temperatures and if the low temperature is not corrected the OCS will go offline and production equipment will automatically be shutdown.

Rationale for selection of Performance Indicators

The OCS is used to reduce the VOC emissions generated from the evolution of VOCs from FPM materials. Production is considered batch process, so that production rate varies. Therefore it is difficult to relate the production rate of the VOC load vented to the OCS.

"VOC destruction efficiency depends upon design criteria (i.e. chamber temperature, residence time, inlet VOC concentration, compound type, and degree of mixing). Thermal destruction of most organic compounds occurs between 590 °C and 650 °C (1100 °F and 1200 °F)."

RTOs utilize the opening and closing of dampers to routinely change the direction of airflow over the beds. This change of airflow direction helps improve mixing of the gases and maintains uniform temperature across the beds. Incomplete combustion in the RTO may be indicated by visible emissions from the stack.

In accordance with 40 CFR 64.4(b)(1) - Presumptively acceptable monitoring includes: "Presumptively acceptable or required monitoring approaches, established by the permitting authority in a rule that constitutes part of the applicable implementation plan required pursuant to Title I of the Act, that are designed to achieve compliance with this part for particular pollutant-specific emissions units." COMAR 26.11.19 achieves the requirements of Title I of the Clean Air Act, Section110. State Implementation Plan (SIP) for VOC and requirement for this source is listed in COMAR 26.11.19.30E.

Rationale for selection of Indicator Ranges

Indicator ranges are based on requirements of the Maryland regulation and are supported by the stack testing data. VOC destruction of most organic compounds occurs between 1100 °F and 1200 °F. The minimum combustion zone temperature of these units is 1400 °F. Alarms are

sounded of the OCS substantially deviates from the set point of 1400 °F. Test methods used to determine VOC destruction efficiency includes EPA Test Method 25A.

See Table 6 for Monitoring Approach.

COMPLIANCE SCHEDULE

W. L. Gore & Associates, Inc – Cherry Hill Plant is currently in compliance with all applicable air quality regulations.

TITLE IV - ACID RAIN

W. L. Gore & Associates, Inc – Cherry Hill Plant is not subject to the Acid Rain Program requirements.

TITLE VI - OZONE DEPLETING SUBSTANCES

W. L. Gore & Associates, Inc – Cherry Hill Plant is subject to Title VI requirements.

SECTION 112(r) - ACCIDENTAL RELEASES

W. L. Gore & Associates, Inc – Cherry Hill Plant is not subject to the requirements of Section 112(r).

PERMIT SHIELD

W. L. Gore & Associates, Inc - Cherry Hill Plant did request a permit shield.

INSIGNIFICANT ACTIVITIES

This section provides a list of insignificant emissions units that were reported in the Title V permit application. The applicable Clean Air Act requirements, if any, are listed below the insignificant activity.

(1) No. 12 Fuel burning equipment using gaseous fuels or no. 1 or no. 2 fuel oil, and having a heat input less than 1,000,000 Btu (1.06 gigajoules) per hour;

[For Areas I, II, V, and VI]

The <u>fuel burning units</u> are subject to the following requirements: COMAR 26.11.09.05A(1), which establishes that the Permittee may not cause or permit the discharge of emissions from any fuel burning equipment, other than water in an uncombined form, which is greater than 20 percent opacity.

<u>Exceptions</u>: COMAR 26.11.09.05A(2) does not apply to emissions during load changing, soot blowing, start-up, or adjustments or occasional cleaning of control equipment if:

- (a) The visible emissions are not greater than 40 percent opacity; and
- (b) The visible emissions do not occur for more than 6 consecutive minutes in any sixty-minute period.

[For Distillate Fuel Oil]

COMAR 26.11.09.07A(1)(c), which establishes that the Permittee may not burn, sell, or make available for sale any distillate fuel with sulfur content by weight in excess of 0.3 percent.

(2) No. 2 Stationary internal combustion engines with an output less than 500 brake horsepower (373 kilowatts) and which are not used to generate electricity for sale or for peak or load shaving;

The <u>affected units</u> are subject to the following requirements:

- (A) COMAR 26.11.09.05B(2), Emissions During Idle Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at idle, greater than 10 percent opacity.
- (B) COMAR 26.11.09.05B(3), Emissions During Operating Mode: The Permittee may not cause or permit the discharge of emissions from any engine, operating at other than idle conditions, greater than 40 percent opacity.
- (C) Exceptions:
 - (i) COMAR 26.11.09.05B(2) does not apply for a period of 2 consecutive minutes after a period of idling of 15 consecutive minutes for the purpose of clearing the exhaust system.
 - (ii) COMAR 26.11.09.05B(2) does not apply to emissions resulting directly from cold engine start-up and warm-up for the following maximum periods:
 - (a) Engines that are idled continuously when not in service: 30 minutes
 - (b) all other engines: 15 minutes.
 - (iii) COMAR 26.11.09.05B(2) & (3) do not apply while maintenance, repair or testing is being performed by qualified mechanics.
- (3) <u>✓</u> Space heaters utilizing direct heat transfer and used solely for comfort heat;
- (4) No. <u>15</u> Unheated VOC dispensing containers or unheated VOC rinsing containers of 60 gallons (227 liters) capacity or less;

The <u>affected units</u> including **EU3-5** are subject to COMAR 26.11.19.09D, which requires that the Permittee control emissions of volatile organic compounds (VOC) from cold degreasing operations by meeting the following requirements:

- (a) COMAR 26.11.19.09D(2)(b), which establishes that the Permittee shall not use any VOC degreasing material that exceeds a vapor pressure of 1 mm Hg at 20 ° C;
- (b) COMAR 26.11.19.09D(3)(a—d), which requires that the Permittee implement good operating practices designed to minimize spills and evaporation of VOC degreasing material. These practices, which shall be established in writing and displayed such that they are clearly visible to operators, shall include covers (including water covers), lids, or other methods of minimizing evaporative losses, and reducing the time and frequency during which parts are cleaned;
- (C) COMAR 26.11.19.09D(4), which prohibits the use of any halogenated VOC for cold degreasing.

W.L. GORE & ASSOCIATES, INC. CHERRY HILL PLANT

PART 70 OPERATING PERMIT FACT SHEET

The Permittee shall maintain on site for at least five (5) years, and shall make available to the Department upon request, the following records of operating data:

- (a) Annual records of the total VOC degreasing materials used; and
- (b) Written descriptions of good operating practices designed to minimize spills and evaporation of VOC degreasing materials.
- (5) Containers, reservoirs, or tanks used exclusively for: (a) ✓ Storage of butane, propane, or liquefied petroleum, or natural gas; (b) No. <u>30</u> Storage of lubricating oils; (c) No. <u>7</u> Storage of Numbers 1, 2, 4, 5, and 6 fuel oil and aviation jet engine fuel: (d) No. <u>>100</u> The storage of VOC normally used as solvents, diluents, thinners, inks, colorants, paints, lacquers, enamels, varnishes, liquid resins, or other surface coatings and having individual capacities of 2,000 gallons (7.6 cubic meters) or less; (6) Gaseous fuel-fired or electrically heated furnaces for heat treating glass or _✓ metals, the use of which does not involve molten materials; Charbroilers and pit barbecues as defined in COMAR 26.11.18.01 with a (7) total cooking area of 5 square feet (0.46 square meter) or less; (8) _✓ First aid and emergency medical care provided at the facility, including related activities such as sterilization and medicine preparation used in support of a manufacturing or production process; (9) Certain recreational equipment and activities, such as fireplaces, barbecue _✓ pits and cookers, fireworks displays, and kerosene fuel use; (10)_✓ Potable water treatment equipment, not including air stripping equipment; Comfort air conditioning subject to requirements of Title VI of the Clean Air (11)Act:

For the following, attach additional pages as necessary:

Laboratory fume hoods and vents;

✓

(12)

(13) any other emissions unit, not listed in this section, with a potential to emit less than the "de minimus" levels listed in COMAR 26.11.02.10X (list and describe units):

Installation Date	General Category	CH nos.	2nd CH nos.	Permit#	Title V EU#	EMIT	Control Device	Fuel	CH Emission Point
Jun-89	Drying	126	2555	6-0041	Insig	-	atmos	Е	
Nov-95	Drying	2328		6-0041	Insig	VOC	atmos	Е	
Jan-02	Forming	62347		6-0104	Insig	PM	fugitive	Е	137
Nov-02	Forming	62924		6-0104	Insig	PM	fugitive	Е	135
Jun-89	Forming	447		6-0041	Insig	VOC	fugitive	Е	

Installation Date	General Category	CH nos.	2nd CH nos.	Permit#	Title V EU#	EMIT	Control Device	Fuel	CH Emission Point
Jun-89	Forming	1304	241	6-0041	Insig	VOC	fugitive	Е	
Jun-89	Forming	1322		6-0041	Insig	VOC	fugitive	Е	
Jun-89	Forming	1323		6-0041	Insig	VOC	fugitive	Е	
Jun-92	Forming	1949		6-0041	Insig	VOC	fugitive	Е	
Dec-07	Forming	1991534		6-0275	Insig	VOC	fugitive	Е	
pre-1989	Forming	976		7-0045	Insig	VOC	fugitive	Е	26
pre-1989	Forming	1266		7-0045	Insig	VOC	fugitive	Е	26
pre-1990	Forming	2052		6-0041	Insig	VOC	fugitive	Е	91
pre-1990	Forming	2101		6-0041	Insig	VOC	fugitive	Е	129
pre-1990	Forming	1376		7-0045	Insig	VOC	fugitive	Е	199
pre-1990	Forming	2014		7-0045	Insig	VOC	fugitive	Е	
pre-1990	Forming	2069		7-0045	Insig	VOC	fugitive	Е	28
pre-1990	Forming	2371		7-0045	Insig	VOC	fugitive	Е	139
Jan-85	Misc	5800		6-0162	Insig	VOC	atmos	Е	63
pre-1990	Misc	0		6-0104	Insig	PM	atmos	Е	
	Misc	2149	2037 & others	7-0045	Insig	voc	fugitive	Е	
Mar-03	Shaping	6044		7-0045	Insig	COMB	atmos	Р	
Oct-04	Shaping	0		7-0045	Insig	VOC	atmos	Е	6
pre-1989	Shaping	853		7-0045	Insig	VOC	atmos	Е	5
pre-1989	Shaping	982		7-0045	Insig	VOC	atmos	Е	18
pre-1989	Shaping	1425		7-0045	Insig	VOC	atmos	Е	98
pre-1989	Shaping	1761		7-0045	Insig	VOC	atmos	Е	35, 36
Mar-05	Shaping	2180		7-0045	Insig	VOC	fugitive	Е	
pre-1990	Shaping	1693		6-0041	Insig	VOC	fugitive	Е	116
	Shaping	60265		6-0041	Insig	-	atmos	Р	175
Jul-02	Shaping	45159		6-0104	Insig	PM	atmos	Е	128
pre-1989	Shaping	242		7-0045	Insig	VOC	fugitive	Е	
pre-1989	Shaping	244		7-0045	Insig	VOC	fugitive	Е	
	Shaping	2310		7-0045	Insig	VOC	fugitive	Е	
pre-1990	Shaping	2344		7-0045	Insig	VOC	atmos	Е	10 ,89
2003	Shaping	61670		7-0045	Insig	VOC	atmos	Е	15

(14) any other emissions unit at the facility which is not subject to an applicable requirement of the Clean Air Act (list and describe):

Installation Date	General Category	CH nos.	2nd CH nos.	Permit#	Title V EU#	EMIT	Control Device	Fuel	CH Emission Point
Dec-07	Conditioning	0		7-0045	Insig	-	atmos	Е	
Mar-07	Conditioning	0		7-0045	Insig	-	atmos	Е	
pre-1990	Conditioning	2166		7-0045	Insig	-	atmos	Е	67
pre-1990	Conditioning	2413		7-0045	Insig	-	atmos	Е	61
pre-1990	Conditioning	2443		7-0045	Insig	-	atmos	Е	120
pre-1990	Conditioning	2444		7-0045	Insig	-	atmos	Е	118
pre-1990	Conditioning	2445		7-0045	Insig	-	atmos	Е	119
Aug-82	Drying	963		6-0130	Insig	VOC	atmos	Е	141
pre-1990	Drying	2211		6-0130	Insig	VOC	atmos	Е	23

Installation Date	General Category	CH nos.	2nd CH nos.	Permit#	Title V EU#	EMIT	Control Device	Fuel	CH Emission Point
pre-1990	Drying	2545		6-0130	Insig	VOC	atmos	Е	140
pre-1990	Misc	0		7-0045	Insig	VOC	atmos	Е	8
	Misc	5084		n/a	3-5	VOC	fugitive	-	
Jan-07	Misc	0		n/a	Insig	COMB	atmos	Р	
Jan-07	Misc	0		n/a	Insig	COMB	atmos	Р	
Jan-07	Misc	0		n/a	Insig	COMB	atmos	Р	
Jan-07	Misc	0		n/a	Insig	COMB	atmos	Р	
Jan-99	Misc	0		n/a	Insig	COMB	atmos	Р	
Jan-85	Misc	0		n/a	Insig	PM	atmos	Е	62
May-07	Shaping	0		7-0045	Insig	-	atmos	Е	
2002	Shaping	2411		7-0045	Insig	VOC	atmos	Ε	
3/6/2007	StackOnly	0		n/a	exempt	VOC	fugitive	Е	200
Aug-07	Tank	BAYCH-600 TK1		n/a	4-1	VOC	atmos	-	
Aug-07	Tank	BAYCH-600 TK2		n/a	4-1	VOC	atmos	-	
	Tank	FP Mezz #23		n/a	4-1	VOC	atmos	-	
pre-1990	Tank	TK1709-01		n/a	4-1	VOC	atmos	-	404
pre-1990	Tank	TK1709-02		n/a	4-1	VOC	atmos	-	405
pre-1990	Tank	TK2453-03		n/a	4-1	VOC	atmos	-	406
pre-1991	Tank	TK2542-04		n/a	4-1	VOC	atmos	-	407
pre-1993	Tank	TK2542-05		n/a	4-1	VOC	atmos	-	408
pre-1992	Tank	TK2542-06		n/a	4-1	VOC	atmos	-	409
pre-1990	Tank	TKno-name		n/a	4-1	VOC	atmos	-	410

STATE ONLY ENFORCEABLE REQUIREMENTS

The Permittee is subject to the following State-only enforceable requirements:

1. <u>Applicable Regulations:</u>

- (a) COMAR 26.11.06.08 <u>Nuisance</u>. "An installation or premises may not be operated or maintained in such a manner that a nuisance or air pollution is created. Nothing in this regulation relating to the control of emissions may in any manner be construed as authorizing or permitting the creation of, or maintenance of, nuisance or air pollution."
- (b) COMAR 26.11.06.09 Odors. "A person may not cause or permit the discharge into the atmosphere of gases, vapors, or odors beyond the property line in such a manner that nuisance or air pollution is created."
- (c) COMAR 26.11.09.10 Requirements to Burn Used Oil and Waste Combustible Fluid as Fuel.
 - A. General Requirements.
 - "(1) A person who proposes to burn used oil or waste combustible fluid in an installation shall submit the following information to the Department:
 - (a) A description of, and the location of, each fuel-burning equipment or other installation in which the used oil or WCF is to be burned and the rated heat input capacity of each;
 - (b) The type and amount of fuel currently being used in each installation and the gallons of used oil or WCF expected to be burned annually;
 - (c) The maximum percentage of used oil or WCF to be burned as fuel in each installation; and
 - (d) An analysis by an independent laboratory of a representative sample of the used oil or WCF, which shall include the concentration of each of the materials listed in §B of this regulation, the PCB concentration, and the flash point.
 - (2) A person may burn on-specification used oil in any installation upon submitting the information required in §A(1) of this regulation.
 - (3) A person who is burning used oil or WCF under a current approval issued by the Department may continue to burn the approved material if:
 - (a) The person registers the equipment that is burning the used oil or WCF by submitting the information required in §A(1) of this regulation; and
 - (b) The used oil or WCF is being burned in an authorized installation.
 - (4) A person who proposes to burn off-specification used oil or WCF in an installation other than a space heater, as provided in 40 CFR §279.23, is subject to the permit or registration requirements in COMAR 26.11.02.
 - (5) A person who receives a permit or registration to burn used oil or WCF shall burn only the materials authorized in the permit or registration.
 - (6) A person may burn off-specification used oil and waste combustible fluid only in those installations listed at 40 CFR §279.12(c).
 - B. Specifications for Used Oil.
 - (1) Except as provided in §B(2) of this regulation, used oil specifications are as follows:

Material Allowable Level

(a) Lead 100 ppm
(b) Totalhalogens 4,000 ppm
(c) Arsenic 5 ppm
(d) Cadmium 2 ppm

(e) Chromium 10 ppm

(f) Flash point 100° F minimum

- (2) For used oil that does not satisfy the rebuttable presumption for halogens at 40 CFR 279.10(b)(1)(ii) and 279.63, the maximum allowable level for halogens may not exceed 1,000 ppm.
- C. Requirements for Burning Used Oil or WCF Containing PCB.
- (1) Used oil or WCF containing quantifiable levels of PCB (2ppm) or greater but less than 50 ppm may be burned only in those installations listed at 40 CFR §279.12(c) or 40 CFR 761.
- (2) Used oil or WCF containing PCB with a concentration of 50 ppm or greater is hazardous waste."

(d) COMAR 26.11.15.05 - Control Technology Requirements.

"A. New or Reconstructed Installations. A person may not construct, reconstruct, operate, or cause to be constructed, reconstructed, or operated, any new installation or source that will discharge a toxic air pollutant to the atmosphere without installing and operating T-BACT."

(e) COMAR 26.11.15.06 - Ambient Impact Requirement.

A. Requirements for New Installations, Sources, or Premises.

- (1) Except as provided in §A(2) of this regulation, a person may not construct, modify, or operate, or cause to be constructed, modified, or operated, any new installation or source without first demonstrating to the satisfaction of the Department using procedures established in this chapter that total allowable emissions from the premises of each toxic air pollutant discharged by the new installation or source will not unreasonably endanger human health.
- (2) If a new installation or source will discharge a TAP that is not listed in COMAR 26.11.16.07 and will be part of an existing premises, then emissions of that TAP from existing sources or existing installations on the premises may be omitted from a screening analysis unless the TAP is added to COMAR 26.11.16.07.

2. Record Keeping and Reporting:

The Permittee shall submit to the Department, by April 1 of each year during the term of this permit, a written certification of the results of an analysis of emissions of toxic air pollutants from the Permittee's facility during the previous calendar year. The analysis shall include either:

- (a) a statement that previously submitted compliance demonstrations for emissions of toxic air pollutants remain valid: or
- (b) a revised compliance demonstration, developed in accordance with requirements included under COMAR 26.11.15 & 16, that accounts for changes in operations, analytical methods, emissions determinations, or other factors that have invalidated previous demonstrations.